

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA**

NORTHERN DYNASTY MINERALS  
LTD. and PEBBLE LIMITED  
PARTNERSHIP,

Plaintiffs,

v.

U.S. ENVIRONMENTAL PROTECTION  
AGENCY

Defendant.

Case No. 3:24-cv-00059-SLG

**DECLARATION OF HEATHER NUDLASH**

I, Heather Nudlash, hereby declare as follows:

1. I am a member of Friends of the Earth.
2. I am a resident of Dillingham, Alaska. I was born in Anchorage but was raised and grew up in the following communities in and around the Bristol Bay watershed: the Historic village of Kijik in Lake Clark, Nondalton, Pope & Vannoy and Kokhanok.
3. My family, the Nudlash family, was the last to leave Kijik Village (Qizhjah Qayeh) and resettle in Nondalton. My great grandma raised me in Nondalton and Dena'ina was my first language.
4. I was raised in the Bristol Bay watershed living a subsistence lifestyle. For example, I spent every summer catching, splitting, and smoking salmon in Pope & Vannoy with my family. I would participate in seal hunts in the springtime with my Auntie in Lake Iliamna.
5. My family moved to Dillingham when I was 11 years old, but we would return to Nondalton, Pope & Vannoy, and Kokhanok based on the subsistence seasons.
6. I currently live in Dillingham because the ability to participate in subsistence activities is very important to me and my family.
7. Year round my family and I subsistence hunt, fish, and gather plants and berries on the land and in the waters throughout the Bristol Bay watershed. My diet consists mainly of subsistence foods that my family and I harvest ourselves or trade with others. For example, in the spring we hunt for geese, ducks and eiders in and around

Dillingham and gather their eggs along with seagull eggs. Beginning in early June we fish for King Salmon near Kanakanak Beach or the Nushagak River. Later in June we begin catching sockeye salmon near Kanakanak Beach, the Nushagak River, Wood River or Lake Aleknagik. In the summer we split, smoke, and process all of our salmon. In August we begin catching returning coho salmon in those same water bodies and go to Lake Aleknagik to catch spawned out red salmon. In the fall we hunt for moose and caribou in and around the mountains near Lake Aleknagik. In the spring and through the fall seasons we pick various berries and plants ranging from salmonberries, blueberries, blackberries, huckleberries, highbush cranberries, currants, fireweed flowers, fiddlehead ferns and tundra tea.

8. I also use the materials from subsistence activities to make jewelry and make traditional skin sewn items.

9. My family has land in Kokhanok, Nondalton, Kokhanok, and Pope & Vannoy. I often visit and intend to return to each of these places to visit family and participate in subsistence activities. For example, in July I often return home to Pope & Vannoy to help family catch and process sockeye salmon that return to Lake Iliamna and go rainbow trout fishing, berry picking, and nettle picking. I own a home in Nondalton and often return in April to fish for grayling. I own land near the Kijik River in Lake Clark and I intend to move back to Nondalton and build a cabin in Kijik. My family owns a home in Kokhanok and I intend to return home to visit family and engage in subsistence salmon fishing in Gibraltar Lake.

10. My knowledge of and interest in the Bristol Bay watershed is who I am. My great grandma and others in my family raised me to know this land, what foods are safe to eat and when. I was taught how to hunt and take care of the animals and plants we harvest. My livelihood and health depend on the animals and plants that live in this region and rely on a healthy environment.

11. I have a deep connection to the Bristol Bay watershed, having been raised in Lake Clark, Lake Iliamna, and Dillingham on the Nushagak River. I have traveled these waters by boat and have paddled Lake Iliamna and parts of Lake Clark by kayak.

12. I have family throughout the Bristol Bay region and intend to return to the places I grew up in to not only participate in subsistence activities, but to enjoy the solitude and quietness. Engaging in subsistence activities brings me peace and allows me to connect with nature. This is what I was taught to do by my great grandmother in the traditional Dena'ina way. If I don't engage in subsistence activities, our family will not have any food. Subsistence practices are not just my culture, they are the way I live and how we have survived as a people. I want to be able to pass these practices down to future generations and we need to have clean water and salmon to do this; the Pebble Mine threatens this.

13. Pebble Mine's exploration activities have already discouraged me from returning to Nondalton because I don't want to see the harm to the land from Pebble's exploration activities or experience noise disturbances from helicopter activity. Our

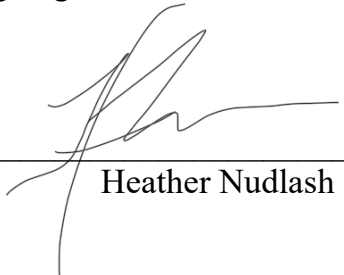
family prefers to catch our salmon from the Nushagak River based on concerns of contamination from water discharges from Pebble's drilling activities.

14. If the Environmental Protection Agency's Federal Determination was overturned and the Pebble Mine was allowed to be permitted and developed, my plans of moving home to Nondalton and building a cabin on my land in Kijik would be halted out of concerns for water contamination and noise pollution from helicopters, planes, and vehicular traffic from the proposed industrial road.

15. The thought of Pebble Mine being developed causes my chest to become tight because I was taught that everything is a cycle and is connected. Freshwater and salmon are a vital part of my life and there are not many places left in the world that are truly wild and sustainable. This watershed is my heart and soul, and it would be devastating if any harm came to it. The potential permitting and development of the Pebble Mine threatens my health, livelihood and my future.

I declare under penalty of perjury that the foregoing declaration is true and correct.

Dated: April 29, 2024

By:   
Heather Nudlash